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8 CVPARTNERS, INC.

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12 San Francisco, CA 94105-1126

13 Attorneys for Defendant
14 MATTHEW HINDE

15 UNITED STATES DISTRICT COURT
16 FOR THE NORTHERN DISTRICT OF CALIFORNIA

17 CVPARTNERS, INC., a California
18 corporation,

19 Plaintiff,

20 v.

21 JEANMARIE BOBEN, an individual;
22 TYLER HUBBS, an individual; MATT
23 HINDE, an individual; and PATRICIA
24 REDINGTON, an individual; ANDY
25 DUNAYCZAN, an individual; and
26 DOES 1-15,

27 Defendants.

No. CV 09 00689 SI

28 STIPULATION AND [PROPOSED]
ORDER FOR PERMANENT INJUNCTION
AGAINST MATTHEW HINDE

29 Plaintiff CVPARTNERS, INC. ("CVPartners" or "Plaintiff") and Defendant
30 MATTHEW HINDE ("Defendant" or "Hinde"), by and through their respective counsel of
31 record (collectively, the "Parties") hereby stipulate and agree to the entry of a permanent
32 injunction against Hinde, or any entity or person acting by, through or in concert with
33 him, as follows:

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- 1 1. Requiring Hinde to delete any information in his LinkedIn, Facebook, or
2 any other web-based account pertaining to any individual or entity who is
3 known to be a CVPartners Client (defined as an individual or entity seeking
4 to fill a job opening, with whom CVPartners did business or who
5 CVPartners represented during Hinde's employment with CVPartners) or
6 CVPartners Candidate (defined as an individual seeking a job with whom
7 CVPartners did business or who CVPartners represented during Hinde's
8 employment), except information pertaining to a CVPartners Client or
9 CVPartners Candidate with whom Hinde had a relationship prior to his
10 employment with CVPartners.
- 11 2. Requiring Hinde to return, delete, and/or erase, as directed by CVPartners,
12 any CVPartners data or documents stored on any devices capable of
13 storing, transferring or processing data in his possession or control.
- 14 3. Enjoining Hinde, for a period of two years from the date his employment
15 with CVPartners terminated, from entering into a partnership with, working
16 with in any capacity, or becoming employed by defendants Jeanmarie
17 Boben, Tyler Hubbs, Patricia Redington, or any entity owned or operated
18 by any or all of said defendants.
- 19 4. Enjoining Hinde, for a period of two years from the date his employment
20 with CVPartners terminated, from soliciting or doing business with any
21 individual or entity who was and is known to be a CVPartners Client or
22 CVPartners Candidate, in the recruiting areas of finance and accounting,
23 information technology, human resources, scientific, clinical research or
24 regulatory affairs. Hinde shall not be enjoined from soliciting or doing
25 business with a CVPartners Client or CVPartners Candidate with whom
26 Hinde had a relationship prior to his employment with CVPartners.
- 27 5. Enjoining Hinde from disclosing to any third party or using for himself any
28 information concerning the business or business practices of CVPartners,

1 learned by Hinde during his employment with CVPartners, unless express
2 written approval is obtained before such disclosure or use.

- 3 6. Enjoining Hinde, for a period of two years from the date his employment
4 with CVPartners terminated, from hiring or causing to be hired any current
5 employee of CVPartners, and from hiring or causing to be hired defendants
6 Jeanmarie Boben, Tyler Hubbs, or Patricia Redington.

7 IT IS SO STIPULATED between the Parties.

8 DATED: April 30, 2009

HANSON BRIDGETT LLP

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10 By: 

SANDRA L. RAPPAPORT
Attorneys for Plaintiff
CVPARTNERS, INC.

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13 DATED: April 30, 2009

MORGAN, LEWIS & BOCKIUS, LLP

14
15 By: 

L. JULIUS M. TORMAN
Attorneys for Defendant
MATT HINDE

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18 IT IS SO ORDERED:

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20 DATED: _____



HONORABLE SUSAN ILLSTON
U.S. District Court Judge